

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA, Plaintiff, v. 33.92356 ACRES OF LAND MORE OR LESS, SITUATED IN VEGA BAJA, COMMONWEALTH OF PUERTO RICO, AND JUAN PIZA BLONDET, et al. Defendants	CIVIL 98-1664CCC CIVIL 98-2344CCC
--	--

**SUPPLEMENTAL MOTION FOR RELIEF FROM ORDER
PURSUANT TO FRCP RULE 60(b)(1) and MOTION TO SUBMIT EXHIBITS
PURSUANT TO ORDER DATED NOVEMBER 22, 2004**

NOW INTO COURT, through undersigned counsel comes Defendant-landowner Juan Piza-Blondet who respectfully moves the Court as follows:

1. The undersigned previously moved this Honorable Court for relief from the Court's Order of December 23, 2004, based upon FRCP Rule 60(b)(1). Pursuant to the Court's instructions, Defendant Piza-Blondet files this Supplemental Motion for Relief and Motion to Submit Exhibits pursuant to the Court's Order of November 22, 2004. Due to the nature of the documentation (large survey maps) there impossible to scan and file through the internet, we cetified that we are sending the documentation via Express Mail to this Honorable and to Plaintiff's legal representation.

2. Defendant Piza-Blondet incorporates by reference as if copied herein *in extensio* all of the allegations and averments contained in the Defendant's Motion for Relief from Order and further avers that Defendant is now in compliance with the Court's November 22, 2004, Order pertaining to the submission of evidence to the Court.
3. Defendant Piza-Blondet further moves the Court for permission to submit all of the Exhibits which are detailed in the attached Exhibit List. (Exhibit List attached hereto as an Appendix).

Defendant-landowner therefore requests that this Court grant the Motion for Relief from Order Pursuant to FRCP Rule 60(b)(1) thereby vacating the Court's December 23, 2004 which prohibits the Defendant from introducing evidence pertaining to the value of the land parcels at issue in this case and that the Court grant the Motion to Submit Exhibits.

RESPECTFULLY SUBMITTED,

S/Maurice V. Piza
5500 Prytania St. #210
New Orleans, LA 70115
Telephone: (504) 2778211
Fax: (504) 277-2358

Copies to:

JOSE M. PIZARRO ZAYAS
Assistant U.S. Attorney
Room 452 Federal Building
Hato Rey, Puerto Rico 00918
Tel. 766-5656

PAUL HARRISON
JEFFREY M. TAPICK
Attorneys, U.S. Department of Justice

Environment and Natural Resources Division
P.O. Box 561 - Ben Franklin Station
Washington, D.C. 20044
Telephone: 202-305-0299
Fax: 202-305-0398

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA, Plaintiff, v. 33.92356 ACRES OF LAND MORE OR LESS, SITUATED IN VEGA BAJA, COMMONWEALTH OF PUERTO RICO, AND JUAN PIZA BLONDET, et al. Defendants	CIVIL 98-1664CCC CIVIL 98-2344CCC
--	--

ORDER

IT IS HEREBY ORDERED, that Defendants' Motion for Relief from Judgment is hereby **GRANTED**;

IT IS FURTHER ORDERED, that Defendant's Motion to Submit Exhibits is hereby **GRANTED**.

San Juan, Puerto Rico this ____ day of _____ 2005.

United States District Court Judge

APPENDIX

Exhibit List

<u>Exhibit No.:</u>	<u>Description of Exhibit:</u>
Exhibit 1	Permit for (27) 900 meter lots Zoned R-1
Exhibit 2	Permit for (44) 900 meter lots Zoned R-1
Exhibit 3	Permit for (27) 900 meter lots Zoned R-1
Exhibit 4	Permit for (49) 300 meter lots Zoned R-3
Exhibit 5	Approval for Construction of Gas Station
Exhibit 6	Approval by ARPE for Construction of Restaurant
Exhibit 7	Survey Map Approved by ARPE for sale of (9) 900 meter lots Zoned R-1
Exhibit 8	Survey Map Approved by ARPE for sale of (1) 1200 meter lot Zoned R-1
Exhibit 9	Construction Permit for (1) 1200 meter lot Zoned R-1
Exhibit 10	Walk Up Building Resolution filed and pending before ARPE
Exhibit 11 before	Survey map for (18) lots filed and pending ARPE for authority to sell lots
Exhibit 12	Pictures of Entrance to the La Julia Development
Exhibit 13	Various pictures of completed and “under construction” home sites located in the La Julia Development
Exhibit 14	Various sales documents pertaining to lots and home sites sold by Juan Piza-Blondet

APPENDIX

Exhibit List

<u>Exhibit No.:</u>	<u>Description of Exhibit:</u>
Exhibit 15	Survey map of expropriated property
Exhibit 16	Survey map depicting Zoning classification for various lots and developments